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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

SHANNA MARIE BERMODES,)	Case No.: 2:25-cv-00153-CKD
Plaintiff,)	STIPULATION AND ORDER FOR AN
vs.)	EXTENSION OF TIME
COMMISSIONER OF SOCIAL SECURITY,)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended forty-five (45) days from May 8, 2025, up to and including June 22, 2025. This is the Defendant's first extension request.

Pursuant to the agency's recent deferred resignation/retirement program, the undersigned counsel, Michelle A. Pavelek, will be placed on administrative leave as of Monday, May 5, 2025. Consequently, all of the undersigned counsel's cases, including this one, must be reassigned to alternative counsel. Defendant requests this extension not only to ensure a smooth transition as many cases are being reassigned, but also to provide new counsel time to review the record; evaluate the issues raised in Plaintiff's brief; determine whether options exist for settlement; and

1 if not, to prepare Defendant's response to Plaintiff's motion. Although the request is for 45 days,
2 Defendant's counsel will endeavor to complete these tasks as soon as possible. This request is
3 made in good faith and with no intention to unduly delay the proceedings, and counsel
4 apologizes for any inconvenience.

5 The parties further stipulate that the Court's Scheduling Order shall be modified
6 accordingly.

7 Respectfully submitted,

8 DUARTE, URSTOEGER & RUBLE, LLP

9 Dated: May 2, 2025

/s/ Jeffrey R. Duarte*

(*as authorized via e-mail)

10 JEFFREY R. DUARTE

11 Attorney for Plaintiff

12 Dated: May 2, 2025

MICHELE BECKWITH

Acting United States Attorney

13 MATHEW W. PILE

14 Associate General Counsel

15 Social Security Administration

16 By: /s/ Michelle A. Pavelek

MICHELLE A. PAVELEK

17 Special Assistant U.S. Attorney

18 Attorneys for Defendant

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20 **ORDER**

21 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
22 extension, up to and including June 23, 2025 to respond to Plaintiff's Brief and Plaintiff's
23 optional reply brief will be extended to July 7, 2025.

24 Dated: May 2, 2025



25 CAROLYN K. DELANEY

26 UNITED STATES MAGISTRATE JUDGE